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BY CM/ECF

December 21, 2021

Hon. Louis L. Stanton
U.S. District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007-1312

re: *Pivar v. The Van Gogh Museum*, No. 1:21-cv-09362-LLS

Dear Judge Stanton:

I represent the defendant, the Van Gogh Museum Foundation, named in the complaint as the Van Gogh Museum, in this action. The defendant respectfully requests argument on the Motion to Dismiss filed today (ECF No. 9). The motion asserts two grounds for dismissal, *forum non conveniens* and lack of personal jurisdiction. It raises several points concerning the interpretation and enforceability of the parties' agreement to litigate disputes in the Netherlands, and the defendant submits that argument would likely assist the Court in resolving the motion.

Respectfully submitted,



Theodore J. Folkman

cc: Mitchell Cantor, Esq. (by email and mail)
Ralph M. Stone, Esq. (by ECF)